1870) 3 Lans. 39; see *In re Ransom, supra; Morse* v. *Thorsell* (1875) 78 Ill. 600, 604. It was deemed inconvenient and impolitic to hamper the assignability of executory contracts with reference to land by granting a wife an inchoate right of dower in the benefits thereof. *Heed and Wife* v. *Ford* (Ky. 1855) 16 B. Mon 114; *Hamilton* v. *Hughes* (Ky. 1831) 6 J. J. Mar. 581. The result is that the statutes governing dower in equitable estates are so narrowly limited as to have no greater effect than statutes of compulsory distribution.

FOREIGN CORPORATIONS—WITHDRAWAL FROM STATE—SERVICE OF PROCESS. —The defendant was a corporation organized under the laws of Wisconsin and doing business in New York. In compliance with a statute of the latter state, N. Y. Consol. Laws c. 23 (Laws of 1909 c. 28) §§ 15, 16, it appointed an agent to receive service of process. See N. Y. Code Civ. Proc. § § 432, 1780. Later the defendant withdrew from the state but failed to revoke the designation of the agent. The plaintiff corporation, organized under the laws of New York, sued the defendant upon a cause of action which arose out of the state but before the withdrawal of the defendant. Service of process was had upon the designated agent. On motion to set aside the service, *held,* the defendant corporation was not within the state for jurisdictional purposes. *Chipman* v. *Jeffrey Co.* (1920) 40 Sup. Ct. 172.

It is a fundamental requisite of due process of law that a corporation be within the state where service of process is attempted upon it, which has been interpreted to mean that it must be carrying on a regular, systematic course of business therein. *Tauza* v. *Susquehanna Coal Co.* (1917) 220 N. Y. 259, 115 N. E. 915; *Dollar Co.* v. *Canadian C. & F. Co.* (1917) 220 N. Y. 270, 115 N. E. 711; *Riverside Mills* v. *Menefee* (1914) 237 U. S. 189, 35 Sup. Ct. 579; 20 Columbia Law Rev. 205. The rule is the same whether service is to be made upon a designated agent or upon a general officer. *Bagdon* v. *Phil. & Reading C. & I. Co.* (1916) 217 N. Y. 432, 111 N. E. 1075; *Goldey* v. *Morning News* (1895) 156 U. S. 518, 15 Sup. Ct. 559; *Wilkins* v. *Queen City Savings Bank & Trust Co.* (C. C., 1907) 154 Fed. 173; *Louden Machinery Co.* v. *American Mal. Iron Co.* (C. C., 1904) 127 Fed. 1008. But, on the other hand, where the corporation is doing business within the state so as to make it amenable to process under this rule, the cause of action sued upon need not arise within the state. *Bagdon* v. *Phil. & Reading C. & I. Co., supra; Smolik* v. *Phil. & Reading C. & I. Co.* (D. C., 1915) 222 Fed. 148. Statutes preserving rights of action against a foreign corporation by service of process upon a state official or other agent designated for that purpose and providing that such designations are irrevocable even after the withdrawal of the corporation from the state, are valid and constitutional, but only as to causes of action arising within the state while the defendant was doing business there. *Collier* v. *Mutual Reserve Fund Life Ass'n* (C. C., 1902) 119 Fed. 617; *Woodward* v. *Mutual Reserve Life Ins. Co.* (1904) 178 N. Y. 485, 71 N. E. 10; *Hunter* v. *Mutual Reserve Life Ins. Co.* (1906) 184 N. Y. 136, 76 N. E. 1072; aff'd (1910) 218 U. S. 573, 31 Sup. Ct. 127. Since there was no statute attempting to preserve such actions in the principal case, the court properly held that the withdrawal of the defendant was a revocation of the agency *ipso facto. Swann* v. *Mutual Reserve Fund Life Ass'n* (C. C., 1900) 100 Fed. 922; *Friedman* v. *Empire Life Ins. Co.* (C. C., 1899) 101 Fed. 535; *Life Association* v. *Boyer* (1900) 62 Kan. 31, 61 Pac. 387; Beale, Foreign Corporations, § 281.